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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRACY COWHERD, individually and on
behalf of herself and all others similarly
situated,

Plaintiff,

v.

MY DAILY CHOICE, INC.,

Defendant.

CASE NO.: 2:24-cv-01128-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND DEFENDANT'S DEADLINE
TO FILE RESPONSE TO PLAINTIFF'S
COMPLAINT**

(FIRST REQUEST)

Pursuant to LR AI 6-1, Plaintiff, TRACY COWHERD ("Plaintiff"), and Defendant, MY DAILY CHOICE, INC. ("Defendant" together with Plaintiff the "Parties"), through their respective counsel, hereby stipulate and agree as follows:

1. Defendant shall have until September 1, 2024 to file its response to Plaintiff's Complaint.

2. This request for extension of time is to allow Plaintiff time to seek consolidation of this matter with Case No. 3:24-cv-00254-ART-CSD, currently pending in this District, and, given the complexity of Plaintiff's allegations, to allow Defendant time to investigate Plaintiff's claims.

3. Defendant expressly reserves all rights, remedies, defenses, objections, and legal arguments, including, but not limited to, its right to move to compel arbitration, its right to move to dismiss any individual or consolidated complaint, its right to challenge joinder of plaintiffs to one another, its right to oppose class certification on any grounds, its rights to oppose consolidation

in any other forum or further consolidation in this forum, and its right to file a motion or motions for summary judgment, among others.

4. This is the Parties' first request for extension of time this deadline, and it is not intended to cause any delay or prejudice to any party.

IT IS SO STIPULATED.

Dated this 2nd day of July 2024.

Dated this 2nd day of July 2024.

GARMAN TURNER GORDON LLP

KAZEROUNI LAW GROUP, APC

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ORDER

IT IS SO ORDERED:


United States Magistrate Judge

DATED: July 3, 2024